

Rainier Commons LLC

Catch Basin Sampling Source Control Action Report

August 12th, 2014

Michelle Mullin, EPA Project Manager:

Pursuant to Condition 6 of the Work Plan approval for the exterior paint abatement work at Rainier Commons and the corresponding Catch Basin Sampling Plan in the IPWP for the Phase I work, we commissioned NVL Labs to collect samples of sediment and water prior to the commencement of blasting work and during the course of the blasting work. The sample results and reports are attached.

The aqueous sample was non-detect for PCBs in both rounds of sampling. The sediment had low concentrations of PCBs, but exceeded the action limit. The blasting work for the first Phase of the work was to be of limited duration; therefore, the time lapse between receipt of the laboratory results of the "pre-work" sampling and the collection of the "during-work" sampling round was short. We used the pre-work sampling as a baseline for comparison to the during-work round of sampling.

As soon as the during-work sampling round was collected we then carried out certain clean-out and maintenance actions to ensure protection of the storm system. Again the aqueous samples were non-detect, but response actions were taken to ensure protection as to the small amounts of sediment that had accumulated.

In addition to our regular source control activities Rainier Commons undertook the following additional steps in response to the sampling results.

Recent actions taken include:

1. Cleaning CB1, CB2 and CB3 from sediments and water. (Exhibit B).
2. Replacing an existing "Catch All" for CB1 with a new one. (Exhibit D).
3. Continuing to inspect, maintain, adjusted and/or replace filter socks in each catch basin as well as on roof drains. Done on a weekly basis or/and as needed. (See for example, Exhibit C).
4. Sending a letter to tenants regarding the finding of cigarettes butts and burns in filter sock and request to bring issue to worker's attention by CGI. (Exhibit E).
5. Clean up of the premises by visual inspection for debris including detached paint chips via shop vacuum and hand collection. In addition to our weekly power sweep by MSI trucks including the court yard area. (Exhibit C).
5. Shop vac courtyard/breezeway area with HEPA filter and continue collecting paint chips by hand as well on a weekly basis.

Thank you,

Vered Mizrahi
Rainier Commons LLC

RCLLC 0005109

\\CUM-SHIL US/09/09 11:26 netmap X:\BL33 cdm-sile-us\11 Site Utilities, CUM-2253466r building 100 MSL 305 Street Improvements, Survey, tank farm fence (black), Jolly Drive thru, East line Road (C

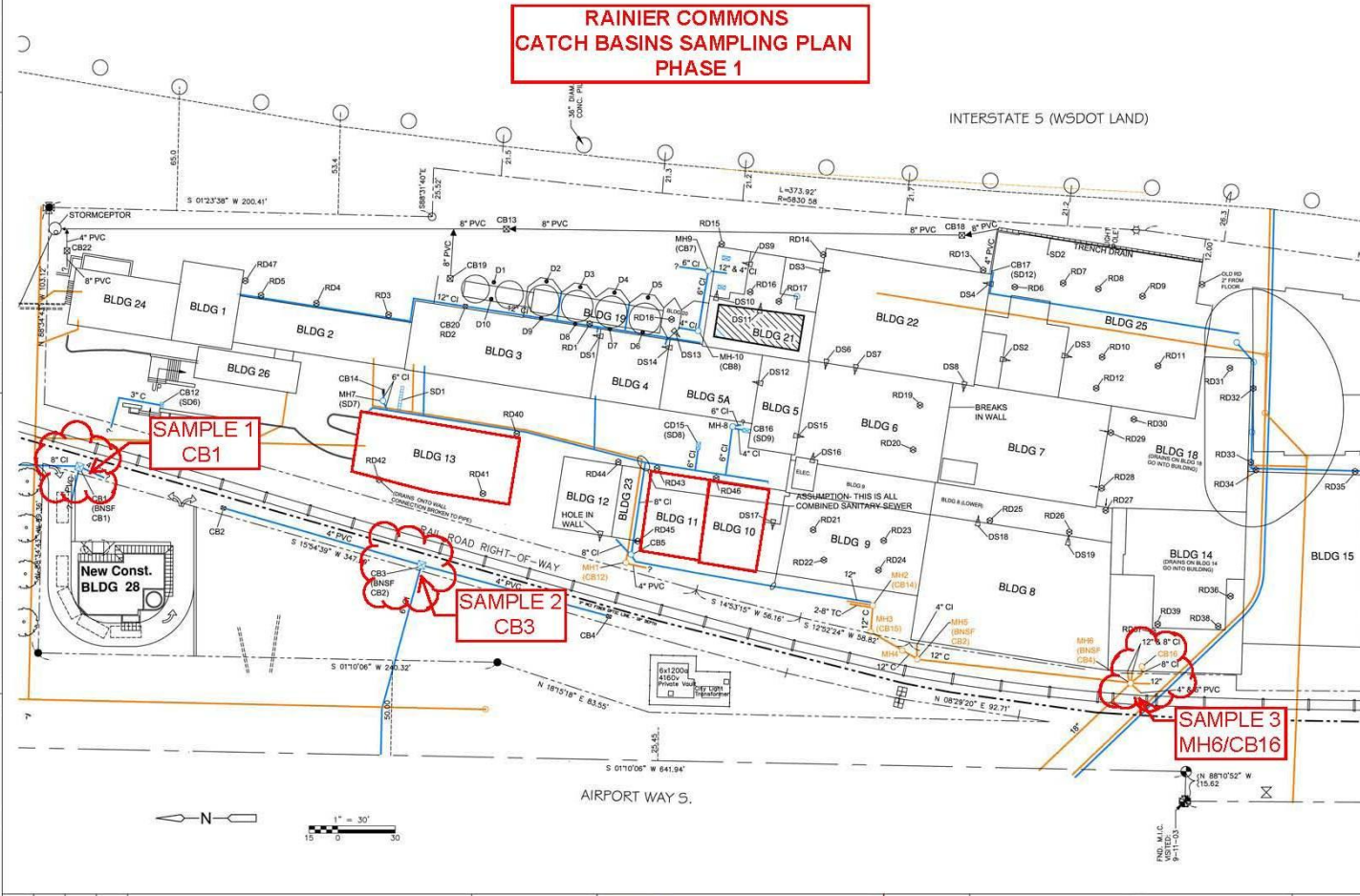


EXHIBIT A

EXHIBIT B



CB1 cleaning after second sampling



CB2 cleaning after second sampling



CB3 cleaning after second sampling

EXHIBIT C



P.O. Box 461 Ravensdale, WA 98051-0461- Phone: (425) 432-1054 – Fax: (425) 432-3155

RAINIER COMMONS WEEKLY REPORT July 7, 2014 – July 11, 2014

Monday, July 7, 2014

Changed both layers of felt on CB14, CB15 and CB16. HEPA vacuumed out those catch basins, changed top layer of felt on CB-1.

Tuesday, July 8, 2014

Cleaned red dumpster area, changed the trash can liners, changed top layer of felt on CB1, CB2, CB3, CB4, CB14, CB15, CB16, cleaned the dumpster area on the back side of the building, cleaned the stairs on Building 25 all the way down, cleaned the door entrances in the middle and cleaned the bird poop.

Wednesday, July 9, 2014

Changed top layer of felt on CB1, CB2, C3, CB4, CB14, CB15, CB16 and HEPA vacuumed CB4, cleaned PCB dumpster area.

Thursday, July 10, 2014

Changed top layer of felt on CB3, HEPA vacuumed CB3 sock and drop latch in catch basin, sucked all water out of CB3 and HEPA vacuumed the bottom of the catch basin.

Friday, July 11, 2014

Changed top layer of felt on CB2 and HEPA vacuumed the sock out and around edges, sucked out all the water in CB2 and HEPA vacuumed the bottom of the catch basin, cleaned up mess in front of main dumpster (Tully's).

EXHIBIT D



CatchAll Environmental, LLC

ADDITIONAL TERMS

Payment terms for CatchAll Environmental Products and Services are net 10 days from date of invoice. Should payment not be made within 45 days from the due date of the service Customer agrees to pay a delinquency charge of 1.5% per month on the delinquent amount from and after the due date. If fees are not paid as agreed and if collection proceedings or a suit is started, then Customer agrees to pay all costs incurred by us, including all costs of suit and a reasonable attorneys' fee as determined by the court.

Any alteration or deviation from the scope of work described in this proposal that requires additional material or labor will result in an extra charge over the stated price.

All of the work will be completed in a workmanlike manner according to standard practices on a timely basis, barring an act of God, labor strikes, or labor disputes, unavailability of materials, or other causes beyond our control. WE MAKE NO OTHER WARRANTY RESPECTING OUR WORK, EXPRESS OR IMPLIED. Under no circumstances shall we be liable for consequential damage including, without limitation, damages for rental expenses or loss of use, opportunity, income, profit, sales, business, financing, or reputation.

You agree to indemnify us, our officers, employees, sub-Service Contractors, and agents and hold them harmless from any claim, liability, loss, cost (including reasonable attorneys' fees), fine, penalty or other expense that may occur or be claimed by or with respect to any person or property and resulting from the presence of HAZARDOUS SUBSTANCE on the job site, or from the movement, handling, transporting or disposal by them of any HAZARDOUS SUBSTANCE located in or on the job site, as required or permitted by the Service Agreement and the Contract, provided that this indemnity obligation shall not apply if the presence of the HAZARDOUS SUBSTANCE was caused by us. The term HAZARDOUS SUBSTANCE, as used herein, shall mean any hazardous, toxic, or dangerous substance, waste, or material or petroleum product which is or becomes regulated under any federal, state, or local statute, rule regulation or ordinance now or hereafter in effect pertaining to environmental protection, contamination or cleanup.

Customer Name: Rainier Commons

Signature: Vul

Date: 06/27/14

CatchAll Environmental LLC:

Signature: _____

Date: _____

EXHIBIT E

Re: Letter to Tenants - Cigarettes Butts
Doug Lansing <lansinghomes@aol.com>
Tue 7/8/2014 5:25 PM
Inbox
To: Vered <Vered@arieldevelopment.com>;
Sure, I'll forward it to Mark.

Doug

-----Original Message-----
From: Vered <Vered@arieldevelopment.com>
To: Doug Lansing <lansinghomes@aol.com>
Sent: Tue, Jul 8, 2014 1:04 pm
Subject: FW: Letter to Tenants - Cigarettes Butts

Doug,

Can you make sure that this issue is addressed at a site safety meeting or other construction meeting with CGI and its crew as well, just in case?

Thank you,
Vered Mizrahi

Rainier Commons LLC 918 S. Horton Street, Suite 1018 | Seattle, WA 98134 ☎: (206) 948-2821 | T:

(206) 447-0263 | F: (206) 447-0299

vered@arieldevelopment.com | www.arieldevelopment.com

Subject: Letter to Tenants - Cigarettes Butts

Dear tenants,

While abatement work is progressing I would like to point out an important issue that was brought to my attention. As many of you know we have a filtering fabric system over our exterior drains and catch basins. This filtering system protects the stormwater that runs off of our property. It is designed to catch debris including paint chips that may come off of the buildings. We recently found burns in the filter fabric when we were inspecting these important installations. Please do not smoke near these drains or catch basins and please be very careful to stub out any cigarettes or other similar products on the hard asphalt surfaces and to dispose of them properly in a garbage receptacle after they are completely extinguished. Please ask all of your guests, employees or contractors to be careful not to flick any burning material on the ground or from car windows onto the grounds. We are doing our best to be extra protective of the environment and we need all of the users of the property to be proactive too. Please be extra cautious and mindful about the disposal of any smoking products to avoid burning our catch basin filters and to avoid creating holes in them. Also, if you are smoking next to the containment currently at buildings 13, 10 and 11, please do not flick cigarettes butts or other smoking products near or around the containment structure. Instead, please fully extinguish on the asphalt and use our garbage bins provided around the property.

Thank you again for helping us keeping our facility clean and safe for everyone.

Vered Mizrahi
Rainier Commons LLC
918 S. Horton Street, Suite 1018 | Seattle, WA 98134

RCLLC 0005114